

## **The Honorable Robert S. Lasnik**

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

ZEMBEZIA FILM LTD.,  
Plaintiff,  
vs.  
Svitlana and Ilya Dolinskiy, husband and wife  
Defendants.

Case No. C13-0312JLR-RSL

**Defendant's Response to Plaintiff's  
PRELIMINARY DISCOVERY**

**Dckt #6**

and

**Motion to QUASH or Vacate the  
Subpoena**

Dear Honorable Robert S. Lasnik,

I ask this court to grant permission to allow me to represent myself in this legal matter. As an American citizen I have my God Given right to liberty and justice, and as stated in The Constitution of the United States Amendment XIV Section 1. "... No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property,

1 without due process of law; nor deny to any person within its jurisdiction the equal  
2 protection of the laws.

3 I, Svitlana Dolinskiy, reside in a small apartment with my family, we only have  
4 one computer that we mainly use for email and nothing more, we do not download or  
5 upload any movies whatsoever, we do not have any wireless routers for outside access,  
6 we don't even have any cable TV. I feel very threatened and discomforted by this  
7 ridiculous lawsuit identifying me as "Computer Fraud person". We are using Comcast  
8 bundle that is routed/shared throughout our apartment complex and I am not to be  
9 involved or held responsible with anything that is happening outside my own home, be it  
10 IP fraud or anything in that nature.

11 Consequently, my name has been involved as computer fraud person with  
12 absolutely no evidence and no reason. This was definitely a deliberate act by the Plaintiff  
13 ZEMBEZIA FILM LTD., to lure out money from ordinary people like Defendant  
14 Dolinskiy and many others to boost up their own gain.

15 I deny any right for ZEMBEZIA FILM LTD., to have any of my personal  
16 information revealed to them at any cause. Amendment IV clearly states: "The right of  
17 the people to be secure in their persons, houses, papers, and effects, against unreasonable  
18 searches and seizures, shall not be violated..." I hereby am filing this **PROTECTIVE**  
19 **MOTION to QUASH or VACATE** the Subpoena submitted by the Plaintiff in this  
20 court. I am also demanding for a Public Jury Trial if the Plaintiff wishes to proceed with  
21 this case (my rights per Amendment V and VI)

22

23 Dated this 24<sup>th</sup> Day of April, 2013

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Ilya Dolinskiy

Defendant

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Svitlana Dolinskiy

Defendant